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File No: 49473

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In re:

MATTHEW SCOTT RAGAN aka MATT  
RAGAN LLC

Debtor.

Bankruptcy Case No. 16-61183 BPH  
Chapter 13

**OBJECTION TO PLAN AND  
MAILING CERTIFICATE**

[Filed Electronically]

Ditech Financial LLC, (referred to herein as "Secured Creditor") holds a valid Note and Trust Deed lien against Debtor's residence and objects to the Chapter 13 Plan of Debtor as follows:

1. The plan does not provide for Secured Creditor's pre-petition arrearage amount of \$137,650.81.
2. The plan is not feasible. The plan will pay approximately \$50,280.00, excluding Chapter 13 Trustee commissions and attorney's fees and costs and will fail to pay all of Secured Creditor's arrearages.
3. The plan should provide that Secured Creditor's trust deed lien and other loan terms remain in effect and are not modified except as expressly provided in the plan.

DATED this 31<sup>st</sup> day of March, 2017.

/s/ Benjamin J. Mann

Benjamin J. Mann

Attorney for Ditech Financial LLC

**MAILING CERTIFICATE**

The undersigned hereby certifies that true and correct copies of the foregoing Objection to Plan and Mailing Certificate were mailed by first class mail, postage prepaid, this 31<sup>st</sup> day of March, 2017, to each of the following:

Matthew Scott Ragan  
33 Wild Goose Lane  
Kalispell, MT 59901  
Debtor

Robert G. Drummond  
Via ECF  
Chapter 13 Trustee

United States Trustee  
Via ECF

/s/ Benjamin J. Mann